



GEORGETOWN LAW

Gary Peller
Professor of Law

July 28, 2014

Via Electronic Filing

Hon. Jesse M. Furman
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

RE: In Re: General Motors LLC Ignition Switch Litigation, 14-MD-2543
(JMF)

Your Honor:

I seek leave to address the Court with respect to the Plaintiffs' leadership issues which the Court addressed in its GM Order No. 5. Because I am not a candidate for any position, I thought it appropriate to seek leave before submitting papers regarding the issue, insofar as the Court's Order did not specifically invite such a non-candidate submission.

I represent several consumers with claims against New GM relating to the ignition switch defect. While I am a Professor of Law there, my representation is not connected with Georgetown University Law Center in any way.

My interest in the leadership issue is based on my representation of plaintiffs in "tag-along" actions. Immediately upon the grant of my pending *pro hac vice* motion, I will be filing one such action directly in this proceeding, *Sesay et al v. GM LLC et al*, on behalf of two Maryland residents. In addition, I represent two District of Columbia residents and another Maryland resident in *Elliott et al v. GM LLC et al*, a lawsuit for which GM has sought consolidation and transfer and in which Plaintiffs have consented to such regarding their ignition switch claims. I am preparing other lawsuits that will likely be consolidated as "tag-alongs" as well.

I wish to submit a letter (and to be heard on August 11 if the Court would find it useful) to bring the Court's attention to differences in the claims that many later filed

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cases, either just arriving or still on their way, may present, the need for leadership sensitive to such claims, and my experience (in this proceeding as well as in other MDL proceedings) with the candidates who have applied for those positions. I believe that the Court is aware of potential conflicts within the plaintiffs' group and the need for leadership to be selected who is sensitive to the diversity of claims presented, *see* GM Order No 5 note 1, and who would be able effectively to coordinate and lead the plaintiffs' group.

Thank you for your consideration.

Very truly yours,

A handwritten signature in cursive script, appearing to read 'Gary Peller', written in dark ink.

Gary Peller (pro hac vice pending)

I served this letter on interested parties via the Court's ECF system.

/s/ Gary Peller

Gary Peller July 28, 2014.